

**Comments to the US Environmental Protection Agency  
from the City of Portsmouth New Hampshire  
March 14, 2013**

Thank you for the opportunity to provide comment with regard to the proposed changes, dated February 12, 2013, to the Draft National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems (MS4s) in New Hampshire. The City of Portsmouth, New Hampshire with a population of approximately 21,000, consists of approximately 17 square miles and is located on the Piscataqua River. Portsmouth's City storm drain infrastructure consists of approximately 323,000 lineal feet of pipe, 4,700 catch basins or manhole structures and 450 outfalls. This proposed General Permit would be applicable to the City's Separated Storm Sewer system.

The City of Portsmouth agrees with the intent and goal of the Clean Water Act. Clean water is a vital resource and should be protected. **However, the proposed regulations are excessively burdensome and some components will not help achieve clean water.** Several general comments applicable to the overall permit conditions are provided here today with my statement, and subsequent comments more specific to the requirements will be provided in writing, prior to the submission deadline which is currently April 15, 2013.

**General Comments:**

1. The Permit, as drafted, would create a significant administrative burden for the City that would *detract* from its ability to provide direct benefits to water quality through such activities as increased street sweeping, increased catch basin cleaning, removal of illicit discharges, and/or conducting inspections of construction sites. The City has estimated that approximately 2,800 staff hours would be required to comply with the administrative components of the draft Permit such as tracking and annual reporting. The total estimated cost to comply with this Permit, an additional \$3,500,000 over the five year permit cycle, would constitute an 8 to 12% increase in the City's current Public Works budget. Due to the current national economic climate, the

Portsmouth City Council is not inclined to increase City budgets, therefore other essential programs would need to be reduced or cut to accommodate these expenditures.

2. Given the magnitude, complexity, and cost implications of this permit the City requests an additional month of comment period to fully vet the permit's potential impacts and to be able to present these impacts to the City Council and the public.

Thank you for the opportunity to provide comments to this proposed permit for stormwater discharges from small municipal separate storm sewer systems.